



**AFFIDAVIT**

I, Shawn S. Hare, a Special Agent with the Federal Bureau of Investigation (FBI), Cleveland Division, being duly sworn, depose and state as follows:

1. I have been employed by the FBI since November of 2014. While employed by the FBI, I have worked organized crime, general violent crime matters, violent crimes against children, and terrorism related matters in the Northern District of Ohio. I attended the Federal Bureau of Investigation academy located in Quantico, Virginia, and have taken the required online courses. At all times during the investigation described in this Affidavit, I have acted in an official capacity as a Special Agent of the FBI.

2. I have participated in all of the usual methods of investigation, including, but not limited to, physical surveillance, the questioning of witnesses, and the analysis of evidence. I have written and executed search warrants resulting in the seizure of materials used in support of a terrorist organization as well as human trafficking.

3. As will be shown below, there is probable cause to believe that Kevin WYROCK has engaged in activity constituting a violation of Title 18 U.S.C. Section 2422(b), in that he knowingly used a facility or means of interstate commerce to persuade, induce or entice a minor to engage in a sexual activity and defendant believed the individual had not attained the age of 18. As well as Title 18 U.S.C. Section 18 U.S.C. 2252A(2)(a), in that he knowingly received child pornography that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer. I am submitting this affidavit in support of an arrest warrant authorizing the arrest of Kevin WYROCK, who resides at 1739 Saratoga Avenue, Cleveland, Ohio, 44109.

4. On Tuesday, October 20, 2015, the Jupiter Police Department began an investigation involving a 12 year old girl with the initials L.O. L.O. met an individual using the user name "Kevagain" on Experience Project (EP), a social media website. After developing a

friendship over a few weeks L.O. sent the individual several nude photographs of herself. "Kevagain" in return sent L.O. a photograph of his penis.

5. According to EP's literature, EP is a social media website which allows users to join existing groups or create their own. The group pages, stories and questions can be viewed by anyone with an EP account. Users can also upload photographs to photo albums, private messages and their own published stories. Photographs added to published stories and public photo albums can be viewed by anyone with an EP account. Photos in private photo albums and in private messages can only be viewed by the user's approved friends. Users can send private messages to other users within the EP app and website. When a user sends a new private message, the message thread can only be viewed by the user and the member they are in correspondence with.

6. On October 27, 2015, a State of Florida subpoena was sent to EP requesting account information for the individual utilizing the username "Kevagain". The subpoena also requested account information for L.O.'s account under her username "CadyenSeriene". The requested time period was from October 01, 2015, to October 26, 2015. Included in EP's response was account information for the two accounts as well as private message content and photographs sent and received to and from the two accounts. EP listed "Kevagain's" internet protocol (IP) address as 108.66.127.69, belonging to AT&T.

7. On November 17, 2015 a State of Florida subpoena was sent to AT&T requesting account information from the IP address. The IP address was registered to Kevin WYROCK with an address of 1739 Saratoga Avenue, Cleveland, Ohio.

8. While communicating with individuals on EP WYROCK revealed that his first name is Kevin, he is from Ohio and that he is a postman for the U.S. Postal Service. He even sent L.O. a photograph of him in his postal uniform, seated in what appears to be a postal vehicle. WYROCK is wearing a pair of sunglasses, the bridge is black in color and the temples appear to be amber and yellow in color.

9. A Cleveland, Ohio area Postal Inspector confirmed there is a Kevin WYROCK with the same Saratoga Avenue home address, employed with U.S. Postal Service in Cleveland. WYROCK's Ohio driver's license also lists his home address as 1739 Saratoga Avenue. He was born in 1967.

10. EP users pick a sex and age range when they create an account. This information is listed next to each member's username. WYROCK picked the age range 41-45 and identified as male. L.O. picked the age range 13-15 and identified as female. Since the two were EP "friends" each had access to the others age rang and sex.

11. Utilizing the EP private messaging feature, L.O. and WYROCK started communicating on October 4, 2015. WYROCK stated he was Kevin from Ohio. He sent L.O. a photograph of him on a beach. The face in the photograph matches WYROCK's driver's license photograph. WYROCK is wearing a t-shirt that appears to be maroon in color with what appears to be a yellow colored design on the front. The letters "CLEVE" can be seen in the design. He has on a dark pair of sunglasses and there is a brown flip flop type shoe near him. That same day WYROCK requested a photograph of L.O. She sent him a photograph of herself and wrote "... sriry if I look 10 in it, like I said before I usually wear make up."

12. On October 5, 2015, WYROCK wrote to L.O. stating "Hehe...was jw...ngl I have had fantasies of giving pleasure to a young hot girl like you;) I would never act on them for obvious reasons but I've often thought about it the thought of you in that skirt bending over did excite me a little...lol." A few posts earlier L.O. mentioned that she decided to wear a short skirt to school that day.

13. On October 5, 2015, WYROCK sent a photograph of him shirtless in what appears to be a home bathroom. His face is visible in the photograph. WYROCK captured his image from a mirror. He is seen holding a cellular telephone which is house in what appears to be a Speck brand black and white phone case. WYROCK is wearing what appears to be a

black pair of bicycling type shorts with three white stripes running along the front top part of the shorts.

14. On October 9, 2015, WYROCK sent text to L.O. stating "...I want to see you in ur bra \*hint hint\* hehe...maybe the next time ur home alone..muahh!" On October 10, 2015, L.O. and WYROCK were having a discussion about her dressing as a boy and wearing a garment that would hide her breasts. During the conversation WYROCK requested to see L.O.'s breasts stating "You know I want to see them..lol."

15. On October 15, 2015, L.O. sent WYROCK two photographs of her breasts. Her face is visible in both photographs. The next morning WYROCK responded by texting "Yours are amazing! I would love to kiss & suck them ;) wish I was a girl for you..lol..& yeah have had some hot girls sexting on here but you are pretty fuckin hot! mmm."

16. Later on October 16, 2015, WYROCK sent L.O. a text stating "Awesome..sounds like a great friend :) so, I took a pic for u..a naughty one.. (my junk) lol..felt I owed you one...see if it does anything for you.. let me know if I should send." L.O. texted "K sure. Thanks." WYROCK sent a photograph of his penis in what appeared to be the same bathroom as the photograph of his bare chest. He texted "Here you go ;) hope you like..took it for you..ur titties got me soo horny..lol."

17. On October 18, 2015, at approximately 21:00:13 hours WYROCK sent a message to L.O. which stated "mmm...nice!! i soo want to see ur pussy;) do u shave her?" At approximately 21:09:57 hours L.O. sent WYROCK a photograph of her fully nude and exposing her vagina. Her face was visible in the photograph. At approximately 21:22:02 hours WYROCK sent L.O. a message which read "ohh my!! that pussy looks really healthy! i might have to lick it to make sure you have the correct response & your boobs should be fine..maybe squeeze them together & show me,"

18. L.O. took most of the photographs on her mother's cellular telephone. After her mother discovered the photographs she contacted the Jupiter Police Department since they live

in Jupiter, Florida. L.O.'s mother gave consent to search her Samsung cellular telephone and Acer Aspire laptop computer which was also used to communicate with WYROCK. Among the content from the search of the telephone were nude photographs of L.O. and the photograph of WYROCK's penis.

19. On Monday, April 25, 2016, L.O. agreed to a video recorded interview. She stated she became a member of EP in approximately September 2015. Her username was "CadyenSeriene". L.O. selected 13-14 years old as her age group. She became friends with an individual named Kevin, a mailman from Ohio. His username was "Kevagain". He sent her a photograph of him sitting at the beach and she thought he appeared to be approximately 30 years old. Kevin also sent her a photograph of him in his postal uniform seated in a mail truck. L.O. believes she sent Kevin approximately nine or ten photographs of herself, several were of her nude. Kevin sent a photograph of his penis to L.O. She believes the photograph was taken in a bathroom.

20. A query of the Cuyahoga County, Ohio Property website listed Kevin WYROCK and his wife as the registered owners of the Target Premises.

21. On October 3, 2016, law enforcement conducted surveillance at the Target Premises. WYROCK was observed exiting his mail truck and walking towards his residence. A female who appeared to resemble his wife was also observed sitting on the front porch with a dog that has been identified in WYROCK's photographs.

22. On October 13, 2016 a federal search warrant was signed by United States Magistrate Judge Thomas M. Parker for WYROCK's residence.


23. On October 14, 2016 the search warrant was executed at WYROCK's residence. WYROCK was contacted at the residence and agreed to be interviewed by affiant and Postal Inspector, Osman Paul Suboyu. WYROCK stated that he used various social media platforms, to include EP. WYROCK identified the user name "Kevagain" as one of the profiles he used regularly while on EP during the time that the site was operational.

24. WYROCK later identified a photograph of L.O. as being an individual with whom


he had met and spoke with on EP. He admitted to exchanging several nude photographs with her, as well as conversing with her in a sexually explicit manner.

CONCLUSION

35. Based on the aforementioned factual information, your affiant respectfully submits that there is probable cause to believe that Kevin WYROCK knowingly used a facility or means of interstate commerce to persuade induce or entice a minor to engage in a sexual activity and defendant believed the individual had not attained the age of 18, and knowingly received child pornography that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer..

  
Shawn S. Hare  
Special Agent  
Federal Bureau of Investigation

Sworn and subscribed before me this 17<sup>th</sup> day in October, 2016.

  
Thomas M. Parker  
UNITED STATES MAGISTRATE JUDGE